

CTJ w/ (625+exp) (T2)

ORIGINAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

FILED  
U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FT. WORTH DIVISION

2014 JUL 18 PM 1:20

CLERK OF COURT

UNITED STATES OF AMERICA §  
v. § 4-14-CR-023-A  
CHRISTOPHER ROBERT WEAST (1) §

**MOTION FOR LEAVE OF COURT TO FILE  
SUPPLEMENTAL DESIGNATION OF EXPERT**

COMES NOW, Christopher Robert Weast, through counsel, Assistant Federal Public Defender Angela R. Saad, and respectfully moves this Court for an order granting the Defendant leave of court to file a Supplemental Designation of Expert out of time for the following reason:

1. The Defendant is scheduled for trial on July 28, 2014. Pursuant to the Court's order in this case, pretrial motions must be filed June 11, 2014.

2. Defense counsel was appointed February 21, 2014 to represent Mr. Weast. On March 11, 2014, defense counsel timely submitted a designation of expert. This request was pursuant to our defense to the first indictment, which alleged violations of 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256(8).

3. On April 22, 2014, counsel's appointment was terminated. Defense counsel was reappointed on June 5, 2014 for the competency hearing. On July 8, 2014, we were again reappointed to represent the defendant for jury trial. While defense counsel was appointed to represent the defendant when the June 11, 2014 deadline passed, the scope of representation was limited to "the competency hearing and related matters." On July 15, 2014, the Court denied our motion for reconsideration of appointment of counsel.

4. The defendant was arraigned on the third superseding indictment July 8, 2014. Currently,

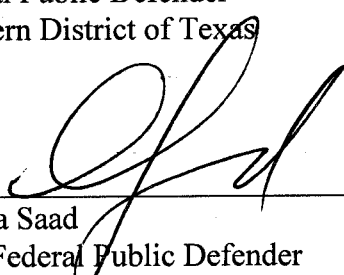
the defendant is facing charges pursuant to 18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2), 2256(8)(A), 2252A(a)(2)(A), and 2252A(b)(1). The charges from the current indictment changed from the original indictment, which in turn changes the defense. In order to ensure the defendant's constitutional rights, defense counsel respectfully requests leave of court to file the Supplemental Designation of Expert out of time.

5. Counsel respectfully requests that this Honorable Court grant leave to file the Supplemental Designation of Expert out of time.

WHEREFORE, Defendant respectfully requests that this Honorable Court allow counsel to file out of time the Supplemental Designation of Expert.

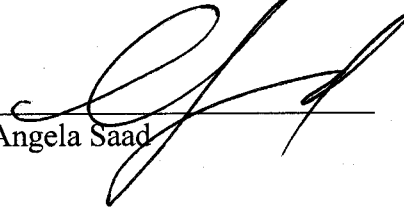
Respectfully submitted,

JASON HAWKINS  
Federal Public Defender  
Northern District of Texas

BY:   
Angela Saad  
Asst. Federal Public Defender  
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Texas State Bar No. 24059016

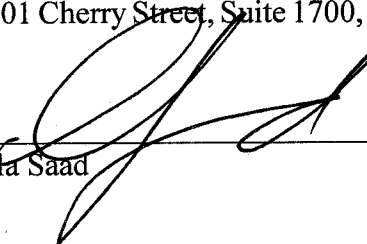
**CERTIFICATE OF CONFERENCE**

I have conferred with the attorney for the government, Aisha Saleem, and she is opposed to this motion.

  
\_\_\_\_\_  
Angela Saad

**CERTIFICATE OF SERVICE**

I, Angela Saad, hereby certify that on July 18, 2014, the above motion was had delivered to Aisha Saleem at the Office of The United States Attorney 801 Cherry Street, Suite 1700, Fort Worth, TX 76102.

  
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Angela Saad